

Exhibit

A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

SOVERAIN SOFTWARE, CIVIL ACTION 6:07-CV-00511-LED
LLC,

Plaintiff,

vs.

CDW CORPORATION,
NEWEGG INC.,
REDCATS USA, INC.,
SYSTEMAX INC.,
ZAPPOS.COM, INC.,
REDCATS USA, L.P.,
THE SPORTSMAN'S GUIDE,
INC., and TIGERDIRECT,
INC.,

Defendants

MICHAEL SHAMOS,

a witness herein, called by the defendant for
examination, taken pursuant to the Federal Rules of
Civil Procedure, by and before William E. Weber, a
Registered Diplomat Reporter and a Notary Public in and
for the Commonwealth of Pennsylvania, with simultaneous
videotape recording, at the offices of The Webb Firm,
700 Koppers Building, Pittsburgh, PA 15219 on Tuesday,
September 1, 2009 at 9:30 a.m.

Reported by: William E. Weber, RDR-CRR

1 There are any number of ways of doing that, but
2 ultimately the cookie protocol was developed, and now
3 there is one universal mechanism that is implemented in
4 browsers, but you could do it in any number of different
5 ways, it is no big deal to store a file on a machine,
6 identify the file by its name, and then emit it back to
7 the website when the, with every HTML request from the
8 browser.

9 MR. GIANNETTI: Thank you, nothing further.

10 RE-EXAMINATION

11 BY MR. HANSON:

12 Q. Now, you mentioned the changes that had to be
13 made to the browser. Were changes also necessary to be
14 made to the server to implement the cookie function?

15 A. Okay, so the answer to that is minimal, but of
16 course, if it didn't previously exist, and you had no
17 commands to create cookies, you would have to add
18 commands to create cookies. Once the set cookie
19 capability became available, if you wanted to use
20 cookies you would go modify your software to issue a set
21 cookie command when you wanted to store something on the
22 user's machine. I mean, you would have to do something.
23 It is not zero. But the mechanism is designed to be
24 elementary, like, you know, anybody can do it.